

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TELECOM BUSINESS SOLUTION, LLC, *et al.*,

Petitioners,

v.

TERRA TOWERS CORP., *et al.*,

Respondents.

Civil Action No. 1:22-cv-01761

Judge Lewis A. Kaplan

Magistrate Judge Robert W.  
Lehrburger

**NOTICE OF MOTION FOR  
FURTHER FINDINGS OF CIVIL CONTEMPT AND SANCTIONS**

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of the Motion for Further Findings of Civil Contempt and Sanctions and appendix thereto (the “Memorandum”), (ii) Declaration of Gregg L. Weiner in Support of the Motion for Further Findings of Civil Contempt and Sanctions dated June 6, 2025, and exhibits thereto, and (iii) Proposed Order, Petitioners Telecom Business Solution, LLC, LATAM Towers, LLC, and AMLQ Holdings (Cay) Ltd., by and through undersigned counsel, hereby move this Court for an Order granting the relief requested in the Memorandum and Proposed Order, and granting such other and further relief as the Court deems just and proper.

Dated: June 6, 2025

Respectfully Submitted,

By: /s/ Michael N. Ungar

Michael N. Ungar

(admitted *pro hac vice*)

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